

**Commonwealth of Kentucky
Division for Air Quality**

PERMIT APPLICATION SUMMARY FORM

Completed by: Jim Morse

GENERAL INFORMATION:

Name:	Texwood Industries, Inc.
Address:	515 Big Stone Gap, Duncanville, Texas 75137
Date application received:	December 17, 1998
SIC/Source description:	2434
EIS #:	21-173-00025
Application log number:	50726 (F931)
Permit number:	V-04-003

APPLICATION TYPE/PERMIT ACTIVITY:

<input checked="" type="checkbox"/> Initial issuance	<input type="checkbox"/> General permit
<input type="checkbox"/> Permit modification	<input type="checkbox"/> Conditional major
__Administrative	<input checked="" type="checkbox"/> Title V
__Minor	<input checked="" type="checkbox"/> Synthetic minor
__Significant	<input checked="" type="checkbox"/> Operating
<input type="checkbox"/> Permit renewal	<input type="checkbox"/> Construction/operating

COMPLIANCE SUMMARY:

<input type="checkbox"/> Source is out of compliance	<input type="checkbox"/> Compliance schedule included
<input checked="" type="checkbox"/> Compliance certification signed	

APPLICABLE REQUIREMENTS LIST:

<input type="checkbox"/> NSR	<input type="checkbox"/> NSPS	<input checked="" type="checkbox"/> SIP
<input type="checkbox"/> PSD	<input checked="" type="checkbox"/> NESHAPS	<input type="checkbox"/> Other
<input type="checkbox"/> Netted out of PSD/NSR	<input type="checkbox"/> Not major modification per 401 KAR 51:017, 1(23)(b) or 51:052,1(14)(b)	

MISCELLANEOUS:

- ☐ Acid rain source
- ☐ Source subject to 112(r)
- ☒ Source applied for federally enforceable emissions cap
- ☐ Source provided terms for alternative operating scenarios
- ☒ Source subject to a MACT standard
- ☐ Source requested case-by-case 112(g) or (j) determination
- ☐ Application proposes new control technology
- ☒ Certified by responsible official
- ☒ Diagrams or drawings included
- ☐ Confidential business information (CBI) submitted in application
- ☒ Pollution Prevention Measures
- ☐ Area is non-attainment (list pollutants):

EMISSIONS SUMMARY:

Pollutant	Actual (tpy)	Potential (tpy)
PM	5.27	10.5
SO ₂	0.02	0.02
NO _x	3.22	3.22
CO	2.71	2.71
VOC	127.35 with oxidizer 240 without oxidizer	240*
LEAD	0.0	
HAP ? 10 tpy (by CAS)		
1330-20-7 (Xylene)	41.26	41.26
108-88-3 (toluene)	34.00	34.00

* Synthetic Limit

SOURCE PROCESS DESCRIPTION: Texwood manufactures kitchen cabinets. The woodworking department uses various borers, cutters, shapers, and sanders to craft raw lumber into cabinet pieces. The cabinet pieces are subsequently assembled using a waterbased glue and sent to the finish lines.

The spray booths and drying ovens are used to apply and cure finishes on the assembled cabinets. The booths each have High Volume Low Pressure (HVLP) type guns. Overspray ranges from 63% to 92%. The greater part of emissions are in the form of volatile organic compounds (VOCs). Four spray booths have no control on VOC emissions. Four booths are controlled by a regenerative thermal oxidizer. Capture efficiency varies according to design of the booth, and more importantly the material being sprayed. Compliance with National Emission Standards for Hazardous Air Pollutants (NESHAP) guidelines as detailed in 40 CFR 63, Subpart JJ is achieved by using a combination of compliant coatings and averaging.

EMISSION AND OPERATING CAPS DESCRIPTION: Although the source is major with regard to HAPs, they have voluntarily accepted limits on the amount of VOCs emitted to avoid PSD review. The limit on VOC emissions is 240 tons per year. Actual emissions of VOCs are based on yearly emissions for 2002, a year in which 241 tons of VOC were emitted. Emissions with the oxidizer in operation have been calculated based on the same 2002 material usage.

OPERATIONAL FLEXIBILITY: Operational flexibility is built into the NESHAP, which allows sources the choice of using all compliant coatings, averaging, or a combination in order to achieve compliance. Flexibility within the limit for VOC's allows the emissions to come from any part of the plant with no individual limits at spray booths